JAY J. BLUMBERG \*
jiblumberg@blumberglawoffices.com
CERTIFIED CIVIL TRIAL ATTORNEY

CHRISTOPHER M. WOLK \* cwolk@blumberglawoffices.com

KIRA FEENY SPAMAN\* kspaman@blumberglawoffices.com

JEFFREY P. CATALANO+ jcatalano@blumberglawoffices.com

OF COUNSEL
JEAN S. CHETNEY\*
jchetney@blumberglawoffices.com

\*MEMBERS OF P.A and N.J. BAR +MEMBERS OF N.Y. and N.J. BAR



June 2, 2015

## VIA E-FILING ONLY

The Honorable Jennifer C. Boal United States District Court - District of Massachusetts 1 Courthouse Way Suite 2300 Boston, Massachusetts 02210

RE: In Re New England Compounding

Docket No. 1:13-md-02419-RWZ; MDL No. 2419

Dear Judge Boal:

I am writing on behalf of the defendants Premier Orthopedic and Sports Medicine Associates of Southern New Jersey, LLC, Premier Orthopedic Associates Surgical Center, LLC, and Kimberly Yvette Smith, M.D. (Hereinafter "The Premier Defendants") to address the upcoming issue of choice of law in this MDL.

There are over fifty cases filed against the Premier Defendants in association with this MDL, and the Premier Defendants anticipate being impacted by the choice of law. Accordingly, I respectfully notify this Court that the Premier Defendants intend to engage in the upcoming motion practice regarding the choice of law for this MDL, by filing any required and supporting papers necessary. The Premier Defendants intend to advocate for New Jersey law to control.

Thank you.

Respectfully,

**BLUMBERG & WOLK, LLC** 

/s/ Christopher M. Wolk

Christopher M. Wolk, Esq.

CMW/dm

June 2, 2015 Page 2

## **CERTIFICATE OF SERVICE**

I, Christopher M. Wolk, Esq., hereby certify that I caused a copy of the foregoing letter to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: June 2, 2015 /s/ Christopher M. Wolk, Esq. Christopher M. Wolk, Esq.